U.S. DEPARTMENT OF COMMERCE
National Oc anic and Atm sph ric Admin.
National Ocean Service
Office of Ocean Resource Conservation and Assessment
Hazardous Materials Response and Assessment Division
c/o EPA Waste Management Division (HEE-6)
J.F. Kennedy Federal Building
Boston, MA 02203
21 May 1996

Ms. Christine Williams
U.S. EPA Waste Management Division
J.F. Kennedy Federal Building
Boston, MA 02203

Mr. Philip Otis
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Dear Ms Williams/Mr. Otis:

I reviewed the proposed plan for Site 09 - Allen Harbor Landfill, NCBC Superfund Site, Davisville, Rhode Island. This remedy eliminates much of the ground water contribution to the intertidal environment and all of the surface runoff. Hence, this reduces future ecological risk in this locale.

Migration of the ground water through a portion of the landfill debris will still occur thereby necessitating a long-term monitoring program as outlined on Page 12 of the Proposed Plan. Clearly, the seeps will need to be identified and subsequently sampled. Sediment in contact with the seeps should be analyzed for the site contaminants of concern; I would recommend using the Effects Range - Median (ERM) as the concentration above which further action to eliminate the ground water pathway (i.e., construction of an upgradient slurry wall) may be considered. I suggest using the ERM as a means to initiate biological testing followed by remedial action if both the ERM and biological test (e.g., toxicity test) show evidence of potential risk.

I also looked over the Responses to Comments on the Allen Harbor and Calf Pasture Point Marine Ecological Risk Assessment Report. The Navy requested input on two issues.
1. NOAA comment concerning releases from Calf Pasture Point. The question concerned source control options of which NOAA requests some study concerning the potential linkage of site-related contaminants to observed impacts. If, indeed, this is shown than a source control option may be needed.
2. EPA comment #14.1 concerning condition indices at the reference location compared to those in Allen Harbor. NOAA agrees with the Navy that comparisons among stations indicate little evidence of impact; this is a stronger data presentation than the comparison between a weak reference location and site-related stations.. However, the Navy selected the reference location and should use it in their risk assessment. The risk can then be "explained away" in the uncertainty section of the document. The argument presented herein is adequate.

Please let me know if you have any questions.

Sincerely,

Kenneth Finkelstein, Ph.D.

cc: Tim Prior (USF&WS)